



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 2, 2000

Frederic D. Woocher, Esq.
Strumwasser & Woocher
100 Wilshire Blvd., Suite 1900
Santa Monica, CA 90401

RE: MUR 4742
Juan Vargas; Vargas for Congress '96 and
Deanna Liebergot, as treasurer; Larry
Remer/The Primacy Group

Dear Mr. Woocher:

On September 26, 2000, the Federal Election Commission considered the General Counsel's Brief in this matter dated July 13, 2000, as well as your letter brief dated September 15, 2000. After considering the circumstances of the matter, the Commission determined to take no further action against Larry Remer/The Primacy Group. The Commission also determined to take no further action against Juan Vargas, and against Vargas for Congress '96 and Deanna Liebergot, as treasurer, with respect to 2 U.S.C. § 441a(f).

In addition, the Commission found that there is probable cause to believe Vargas for Congress '96 ("the Committee") and Deanna Liebergot, as treasurer, violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with their failure to timely report debt incurred by the Committee as a result of its agreement with The Primacy Group.

The Commission has a duty to attempt to correct such violations for a period of at least 30 days and no more than 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement after 30 days, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

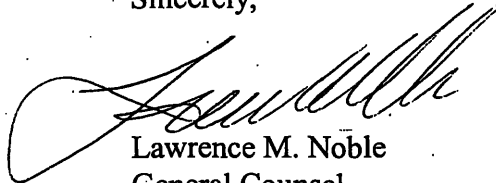
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

0301-04-403-1930

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If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Tony Buckley, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

21.04.403.1931